

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 15-19120**  
**Jennifer J. Pearson-Mills DBA** : **Chapter 13**  
**Jennifer's Stay & Play Preschool, Inc.,** : **Judge Ashely M. Chan**  
**DBA Jennifer's Family Child Daycare,** : **\*\*\*\*\***  
**Inc.** :  
: **Debtor(s).**

**PRAECIPE TO WITHDRAW CREDITOR'S OBJECTION**  
**TO DEBTOR'S CHAPTER 13 PLAN**

Kindly withdraw the Objection to Debtor's Amended Chapter 13 Plan that was filed on July 7, 2016, on behalf of Wells Fargo Bank, NA ("Creditor") at Docket number 62.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Kimberly A. Bonner (89705)

Holly N. Wolf (322153)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 15-19120**  
**Jennifer J. Pearson-Mills DBA** : **Chapter 13**  
**Jennifer's Stay & Play Preschool, Inc.,** : **Judge Ashely M. Chan**  
**DBA Jennifer's Family Child Daycare,** : **\*\*\*\*\***  
**Inc.** :  
: **Debtor(s).**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Praeipue to Withdraw Creditor's Objection to Debtor's Chapter 13 Plan was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,  
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, 1234 Market Street, Suite 1813, Philadelphia, PA  
19107

Jonathan J. Sobel, Attorney for Jennifer J. Pearson-Mills, 1500 Walnut Street, Suite 2000,  
Philadelphia, PA 19102, mate89@aol.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on June 1, 2017:

Jennifer J. Pearson-Mills DBA Jennifer's Stay & Play Preschool, Inc., DBA Jennifer's Family  
Child Daycare, Inc., 7964 Thouron Avenue, Philadelphia, PA 19150

DATE: June 1, 2017

/s/ Karina Velter  
Karina Velter, Esquire (94781)  
Kimberly A. Bonner (89705)  
Holly N. Wolf (322153)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina  
Velter.

Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)